

**UNITED STATES DISTRICT COURT
DISTRICT OF PUERTO RICO**

In re:

THE FINANCIAL OVERSIGHT AND
MANAGEMENT BOARD FOR PUERTO
RICO

as representative of

THE COMMONWEALTH OF PUERTO
RICO,
et al.,

Debtors.¹

PROMESA
Title III

Case No. 17 BK 3283-LTS

**WITHDRAWAL OF MOTION FOR PAYMENT OF ADMINISTRATIVE EXPENSE
POST-PETITION COMMERCIAL LEASE AT DOCKET NO. 15278**

**TO THE UNITED STATES DISTRICT COURT JUDGE
THE HONORABLE LAURA TAYLOR SWAIN:**

COMES NOW, AGM PROPERTIES CORPORATION (hereinafter, “Landlord”), and
before this Court respectfully requests:

1. On November 25, 2020 appearing Landlord filed a “Motion for Payment of Administrative Expense Post-Petition Commercial Lease Rent”, based on a commercial lease agreement executed by the 9-1-1 GOVERNMENT SERVICE BOARD (in the Spanish language “Junta de Gobierno

¹ The Debtors in these Title III Cases, along with each Debtor’s respective Title III case number and the last four (4) digits of each Debtor’s federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (“Commonwealth”) (Bankruptcy Case No. 17-BK-3283-LTS (Last Four Digits of Federal Tax ID: 3481); (ii) Puerto Rico Sales Tax Financing Corporation (“COFINA”) (Bankruptcy Case No. 17-BK-3284-LTS) (Last Four Digits of Federal Tax ID: 8474); (iii) Puerto Rico Highways and Transportation Authority (“HTA”) (Bankruptcy Case No. 17-BK-3567-LTS) (Last Four Digits of Federal Tax ID: 3808; (iv) Employees Retirement System of the Government of the Commonwealth of Puerto Rico (“ERS”) (Bankruptcy Case No. 17-BK-3566-LTS) (Last Four Digits of Federal Tax ID: 9686; (v) Puerto Rico Electric Power Authority (“PREPA”) (Bankruptcy Case No. 17-BK-4780-LTS) (Last Four Digits of Federal Tax ID: 3747); and (vi) Puerto Rico Public Buildings Authority (“PBA”) (Bankruptcy Case No. 19-BK-5233-LTS) (Last Four Digits of Federal Tax ID: 3801) (Title III case numbers as listed as Bankruptcy Case numbers due to software limitations).

del Servicio 9-1-1”), (“Lessee”) for the occupation of certain premises owned by Landlord (16,784 sq. ft. Lot E Corporate Office Park, San Juan, Puerto Rico; hereinafter, the “Premises”). Docket no. 15278.

2. On November 30, 2020, this Honorable Court entered order granting Lessee until December 9, 2020 to file its opposition. Several extensions to deadlines were requested and granted by this Court. See docket nos. 15284, 15406, 15617 and 15620.

3. On January 21st, 2021 Landlord received complete payment of post-petition rent due from Lessee, rendering moot the motion filed by Landlord on November 25, 2021.

4. Landlord, therefore, hereby withdraws its “Motion for Payment of Administrative Expense Post-Petition Commercial Lease” filed on November 25, 2020 at docket no. 15278.

WHEREFORE, it is respectfully requested that this Honorable Court take note of Lessee’s compliance with rent payment and enter order granting Landlord’s withdrawal of “Motion for Payment” filed at docket no. 15278.

CERTIFICATE OF SERVICE: Landlord and undersigned counsel hereby certify that this motion has been filed thru the District Court’s ECF/ECM electronic filing system which will automatically notify all participants to said system including the US Trustee at ustregion21.hr.ecf@usdoj.gov and the following “Standard Parties”. Movant further certifies that notice of this motion has been made via regular mail on this same date to the entities listed on the List of Creditors Holding the 20 Largest Unsecured Claims. Pursuant to Case Management and Administrative Procedures, “Standard Parties” receiving notice via the Court’s ECF/ECM court noticing system are:

(a) Chambers of the Honorable Laura Taylor Swain

United States District Court for the Southern District of New York
Daniel Patrick Moynihan United States Courthouse
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RESPECTFULLY SUBMITTED.

In San Juan, Puerto Rico this 22nd day of January 2021.

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